

Greater Cambridgeshire Shared Council

By email only

30<sup>th</sup> January 2026

Dear Sir or Madam,

## **GREATER CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION – SPORT ENGLAND REPRESENTATION**

Thank you for inviting Sport England to comment on the above consultation.

### **INTRODUCTORY COMMENTS**

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Planning for Sport Guidance ('Guidance').

The overall thrust of the Guidance is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

**PROTECT** the right opportunities in the right places

**ENHANCE** opportunities through better use of existing provision

**PROVIDE** new opportunities to meet the needs of current and future generations

Sport England's aim in working with the planning system is to help provide active environments that maximise opportunities for sport and physical activity for all, enabling the already active to be more so and the inactive to become active. The importance of sport should be recognised as a key component of local plans, and not considered in isolation.

The following comments are provided within the context of:

- National Planning Policy Framework (DCLG, 2024).
- Sport England's Planning for Sport webpages including Planning for Sport Guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

Sport England welcomes the opportunity to comment on the Greater Cambridge Local Plan at Regulation 18 stage. Sport England is a statutory consultee for planning applications affecting playing fields and a statutory body with a remit to protect and enhance opportunities for sport and physical activity.

These representations are made with specific regard to paragraphs 103 and 104 of the National Planning Policy Framework (NPPF) and Sport England's *Playing Fields Policy and Guidance*. Paragraph 103 of the NPPF requires planning policies to plan positively for the provision and use of shared spaces, community facilities and opportunities for sport and physical activity, while paragraph 104 sets out clear and specific tests which must be met where development would result in the loss of, or prejudice the use of, a playing field.

Sport England therefore have the following comments:

### **THEME: SITE ALLOCATIONS**

#### **Draft Policy S/C/NCA – North Cambridge Academy, 108 Arbury Road, Cambridge**

##### **Sport England: Support in principle, subject to modification**

Sport England supports, in principle, the ambition for North Cambridge Academy to develop as a mixed-use sporting hub, providing enhanced sports facilities and adequate replacement playing field is provided alongside residential development.

As the allocation involves the loss of playing field land, it must clearly demonstrate compliance with paragraph 104 of the NPPF. Sport England supports the policy requirements for:

- Expansion of the existing sports hall;
- Provision of a new 3G pitch, four tennis courts and a MUGA; and
- A Community Use Agreement securing public access outside school hours.

For examination soundness, the policy should explicitly require that any loss of playing field is replaced by provision that is equivalent or better in quantity, quality, accessibility and management arrangements.

Sport England also recommend that replacement facilities are delivered in a timely manner and secured through appropriate planning conditions or obligations.

#### **Draft Policy S/C/BRN – Land at Barnwell Road and Newmarket Road**

Sport England notes that planning permission (23/04687/FUL) has been granted for the redevelopment of this site. The Local Plan should outline that sport facilities (bowls green and tennis court) as part of the planning permission will be replaced,

in accordance with condition 59, as required by planning permission 23/04849/FUL. Outlining this demonstrates that the loss of these sports facilities have been assessed against paragraph 104 of the NPPF and that replacement mitigation provision has been secured.

### **Draft Policy S/C/OPK – Parcel Com4, Orchard Park**

#### **Sport England: Comment**

Sport England objects to the part loss of playing field at this site. The Orchard Park SPD (2011) identified the playing field to remain as public open space. With this said, the planning permission referenced 22/01632/FUL resulted in the loss of the playing field. Sport England cannot find a record of being consulted on that planning application despite being a statutory consultee for development affecting playing fields. Furthermore, having reviewed the Officer's Report, there is no consideration afforded to paragraph 104 of the NPPF. If a future planning application were submitted, the Local Planning Authority should accord with the statutory requirement to consult Sport England.

### **Draft Policy S/AMC/AS – Abbey Stadium**

#### **Sport England: Comment**

Sport England supports the principle of this policy. To ensure that the redevelopment of the stadium and the improvement of the sporting facilities are fit for purpose, we request that the supporting information includes a requirement for the design of the proposals to meet the standards of the Football Foundation and Cambridgeshire Football Association.

### **Draft Policy S/AMC/EB – East Barnwell**

#### **Sport England: Comment**

The East Barnwell area includes the site allocation S/C/BRN. For clarity, we advise you refer to the planning permission 23/04687/FUL and explain that the permission included the replacement of the sports provision to be lost as part of the planning permission 23/04849/FUL. This would demonstrate that the loss of these sports facilities has been assessed against paragraph 104 of the NPPF and that replacement mitigation provision has been secured.

### **Policy S/PRIA/MC – Mitcham's Corner**

#### **Sport England: Comment**

Sport England encourages the integration of Active Design principles, or alternatively reference to our Active Design Guidance, to maximise opportunities for physical activity.

## **Policy S/CE – Cambridge East**

### **Sport England: Comment**

Sport England supports the inclusion of sports provision, including criterion 25(h) which requires the delivery of a sports pavilion (Use Class F2). The scale and type of provision should be informed by an up-to-date Playing Pitch Strategy (PPS), Built Facilities Strategy (BFS) and Facilities Planning Model (FPM) for swimming pools.

## **Policy S/WC – West Cambridge**

### **Sport England: Comment**

Outline planning permission was approved under planning reference 16/1134/OUT. Sport England commented on the planning application on November 2<sup>nd</sup> 2017 raising no objection to the proposal. In our comments we advised that,

*'The existing West Cambridge site contains the University Sports Centre, which provides strategic sports facilities for the University and local community. It is important that new development on this site does not adversely impact on the existing sports facilities, for example through affecting existing car parking serving the new sports facilities, as I understand car parking is relatively limited and is under pressure at peak times...*

*... Sport England would wish to comment further on any detailed proposals for new sports facilities, as well as the arrangements for community access to them. The newly completed Cambridge/South Cambs Sports Facilities Strategy should inform future sports facility development on the site.'*

The provision of on-site sports facilities should be informed by an up to date evidence base, and any subsequent updates. Sport England are aware that the Council are in the process of undertaking a PPS and BFS, and that a FPM for swimming pools has been completed.

## **Policy S/CBN – Cambourne North**

### **Sport England: Support, subject to modification**

Sport England supports the ambition for significant sports and leisure provision, including a regionally significant facility. However, the type and quantity of provision must be informed by a robust, up-to-date PPS, BFS, FPM. Sport England recommend that the policy also includes a requirement for management and maintenance plans for indoor and outdoor sports facilities.

## **Policy S/CB – Cambourne**

### **Sport England: Comment**

Sport England raises concern regarding the use of the term “leisure” and not explicitly referring to indoor and outdoor sport provision. To ensure clarity Sport England recommends criteria a(f) refers to indoor and outdoor sport provision explicitly. The policy should also set out that the indoor and outdoor sports provision should be informed by an up-to-date PPS. Sport England recommend a Sports and Open Space Strategy is also sought as part of the policy.

### **Policy S/GF – Land adjacent to the A11 and A1307, Grange Farm**

#### **Sport England: Support, subject to modification**

Sport England supports the principle of indoor and outdoor sport provision at the new town centre. The policy should be modified to ensure that the quantity and type of indoor and outdoor sport provision onsite are informed by an up-to-date PPS, BFS, FPM. Sport England recommend that a management and maintenance plan is required for the indoor and outdoor sport facilities and a Sports and Open Space Strategy is submitted if these were not secured as part of the outline planning permission.

### **Policy S/NS – Northstowe New Town**

#### **Sport England: Support**

Sport England supports criterion (d) requiring indoor and outdoor sports facilities and strongly supports paragraph 34 requiring maintenance plans for such facilities.

### **Policy S/BRC – Babraham Research Campus**

#### **Sport England: Comment**

Sport England supports the policy and recommends explicit reference to Active Design.

## **THEME: BIODIVERSITY AND GREEN SPACES**

### **Policy BG/PO – Protecting Open Spaces**

#### **Sport England: Object**

Sport England objects to this policy as currently drafted. To align with paragraph 104 of the NPPF, the policy must explicitly protect against the loss of, or prejudice to the use of, playing fields. The wording of the policy does not currently take into account development that prejudices playing fields nor does it prevent playing field being built on unless an assessment has been undertaken which clearly shows the open space, buildings or land to be surplus to requirements.

With that said, Sport England supports the wording '*unless the existing open space can be satisfactorily replaced to an equivalent or better standard in terms of*

*quality, quantity and accessibility.* However, we implore you to list management arrangements also within the criteria of replacement facilities. Reason being is equivalent or better accessibility and management arrangements are required to minimise any detrimental impact on the users of an existing area of playing field from relocation to a new area of playing field.

For example, if an existing area of playing field is available to the local community through a formal community use agreement, then an agreement securing equivalent or better community use of the new area of playing field will be required. Management arrangements mean all aspects that govern the running of a playing field including: ownership arrangements, rental and maintenance costs, management charges, opening hours, community access, staffing levels, and any restrictive covenants. They also include revenue generating activities that support the running of a playing field such as clubhouse social facilities, bars, catering and advertising.

Within the supporting information you may wish to clarify what a suitable location is. Within Sport England's Playing Pitch Policy and Guidance it sets out that a suitable location is a place to which current or former regular users of a playing field, or those who may want to use the playing field now or in the future, can conveniently gain access by a variety of transport modes. The location of playing fields relative to those who use them, or who may wish to do so, is an important consideration in determining whether there is sufficient supply. A simple geographical spread is not the appropriate test to apply in this context. For example, it is more important to understand how convenient the location of a playing field is for its regular users (e.g. 'home' sports teams or schools). This can vary, for example if the users are predominantly juniors, or associated with an organisation with nearby headquarters, then only a playing field very close by is likely to be in an suitable location. To the members of a major sports club, who travel from a wider area, a change of location of a greater distance may be acceptable. You may also wish to consider suitable locations to be places accessible by public transport, cycling and walking.

In terms of point 3, under Policy BG/PO, Sport England recommend removing the wording '*adversely affecting*' to '*result in the loss, or prejudicing the use of playing field*'. Reason being is considering whether a playing field is adversely affected, is a matter of judgement. In contrast paragraph 104 of the NPPF applies to any development resulting in the loss, or prejudicing, the use of playing field unless it meets one of three criteria. The wording of para 104 of the NPPF does not consider if the harm is adverse, but whether the criteria has been met.

## **Policy BG/EO – Providing and Enhancing Open Spaces**

### **Sport England: Support, subject to modification**

Sport England supports the policy but notes that the PPS is currently only at Stage C. Completion of the PPS is required before Sport England can support the Local Plan, and it should be listed as a key supporting evidence document.

### **THEME: WELLBEING AND SOCIAL INCLUSION AND GREAT PLACES**

Sport England supports these policies and recommends explicit reference to Active Design within them:

- Policy WS/HD – Creating Healthy New Developments
- Policy GP/PP – People and Place Responsive Design
- Policy GP/QD – Achieving High Quality Development

### **EVIDENCE BASE AND STRATEGIC RECOMMENDATION**

There is a concern that decisions about planning for meeting the current and future indoor and outdoor sports facility needs of the community will not be based on an up-to-date, and therefore robust, evidence base in accordance with the requirements of paragraph 103 of the NPPF which specifically advises planning policies to be based on robust and up-to-date assessments of needs for open spaces, sports and recreation facilities and opportunities for new provision. A clear understanding of current and future community sports facility needs, including playing fields, is essential for informing and justifying a local plan policy such as Policies BG/EO and BG/PO which covers the protection, enhancement and provision of sports facilities. For example, how would the Council or an applicant be able to clearly demonstrate that an indoor sports facility or playing fields are no longer required if there is no up-to-date objective evidence base available to assess the proposal against.

This concern is supported by the Council's reference to their current evidence base for sport for supporting the local plan i.e. Playing Pitch and Indoor Sport Strategies which was published in 2016. The data collected on the supply and demand for sports facilities which informed the assessments in these strategies is now around 10 years old and is therefore considered to be substantially out-of-date for informing sports facility needs for the Local Plan period. The 2016 strategies were considered by Sport England to be robust at the time they were prepared, and it acknowledged that the Council has made significant investment into indoor sports facilities since then to address needs that were identified in the strategies which is welcomed. However, this does not negate the need for the emerging local plan to be based on an up-to-date evidence base.

Sport England's advice is that assessments of sports facility need should be prepared at least every five years, with updates to the PPS every three years. The

reasons that assessments of need should be based on up-to-date data are as follows:

- The supply of facilities and playing pitches changes significantly over time. As well as new facilities and playing pitches opening and existing ones closing, access to and playing pitches can change (e.g. on school sites), the quality of facilities and playing pitches changes over time as facilities and playing pitches become older (which influences the ability of facilities and playing pitches to meet the expectations of the community) and the format and operation of facilities and playing pitches can change.
- The demand for facilities and playing pitches changes significantly over time. Demand for facilities and playing pitches is affected by a number of factors including population growth, sports participation changes (both general and sport specific), local sports club infrastructure and local sports development initiatives. The nature of the demand will also change over time (e.g. growth in participation by children, women and disabled groups) and the type of facilities and playing pitches required in response to changes in demand will have implications.

The previous assessment of indoor and outdoor sports facility needs will not have accounted for the significant changes in both supply and demand that Sport England is aware has taken place in Greater Cambridge since the data for the 2016 strategy was collected. It will also not have accounted for current projections of future population and sports participation growth in the area which will have changed. Furthermore, the lack of recent consultation with stakeholders such as sports clubs, sports governing bodies, schools, parish councils etc on supply and demand issues may result in current and future needs not being identified.

Since the previous assessments were prepared, it is also advised that the tools and guidance available for collecting data and undertaking assessments with respect to sports facilities, including playing pitches, has advanced and Sport England has published a range of more recent guidance to help local authorities such as the Assessing Needs and Opportunities guidance and the Planning for Sport guidance [https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning\\_for\\_sport\\_guidance](https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance).

Sport England's experience has shown that where local plans have not been supported by up-to-date and robust assessments of need for sports facilities, including playing pitches, Inspectors have requested that this be an issue that requires discussion at the examination of the plans. I would advise that most local planning authorities have prepared (or are preparing) up-to-date indoor sports facility strategies and playing pitch strategies (incorporating needs assessments) in advance of plans being considered at examination in order to ensure that their

local plans are sound. Furthermore, if the evidence base is not updated and continues to be used for determining planning applications, developers are likely to challenge the evidence base especially in the context of the need to protect existing facilities or provide for sport in new development through planning obligations or CIL.

To address these concerns, it is requested that the Council issue an up-to-date indoor and outdoor sports facility strategy incorporating an assessment of needs which will provide the robust evidence to support the policies regarding existing and future indoor and outdoor sport provision in the emerging Local Plan. This approach would in principle allow the plan to accord with Government policy in paragraph 103 of the NPPF.

Sport England are aware the Council are in the process of undertaking these assessments. Detailed advice on the preparation of indoor sports facility strategies and playing pitch strategies can be found on Sport England's website [https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=assessing\\_needs\\_and\\_playing\\_pitch\\_strategy\\_guidance](https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=assessing_needs_and_playing_pitch_strategy_guidance) and further advice can be provided upon request. It is advocated that any new indoor and outdoor sports facility strategy is discussed with Sport England and other stakeholders before being published in support of the local plan. It should be emphasised that Sport England would prefer to provide support to the Council to address this matter during the development of the emerging local plan rather than making formal representations at the Regulation 19 stage.

### **Closing Remarks**

Numerous sites are allocated and if Sport England has missed any sport facility (including playing pitches) that falls within any land allocation, then this does not mean the facility is surplus to current or future need. As stated in the NPPF, sport facilities (including playing pitches) should not be built on unless they are surplus to current or future needs, replaced, or lost to another sport facility the benefits of which outweighs the harm caused by the loss.

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours faithfully,



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